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NUNAVUT WATER BOARD
NUNAVUT IMALIRIYIN KATIMAYINGI
OFFICE DES EAUX DU NUNAVUT

**File No: 2AM-MRY2540**

November 3, 2026

To: Mary River Distribution List

**Subject: Licence No: 2AM-MRY2540 Type A – Mary River Project, Baffinland Iron Mines Corporation, Process Guidance Annual Security Review Associated with 2027 Work Plan**

Dear Parties:

Please be reminded that the Annual Security Review associated with the 2027 Work Plan (the ASR), as required under Licence No: 2AM-MRY2540 (the Licence), issued to Baffinland Iron Mines Corporation (Baffinland or the Licensee) for the Mary River Project (the Project), has commenced with the receipt of the 2027 Work Plan. The ASR process is intended to determine the extent of any difference between the reclamation security currently posted for the Project, taking into account any recently completed progressive reclamation work, the Licensee's 2027 Work Plan, and other relevant factors. In preparation for the ASR, the Nunavut Water Board (NWB or the Board) takes this opportunity to provide stakeholders and interested parties with an overview of the upcoming ASR process, including an anticipated timeline of activities associated with the NWB's conduct of the ASR in the attached Table 1.

Copies of all documents received can be accessed through the NWB's Public Registry using the following link:

2AM-MRY2540 2027 Work Plan

As required by the Licence, the ASR is generally conducted in accordance with Part C and Schedule C of the Licence. Although Table 1 outlines a projected timeline for the ASR, the Board may, with adequate notice, adjust the timelines and events to ensure that all process objectives are achieved. Parties wishing to provide feedback on the timelines and/or activities included in Table 1 should do so by **12:00 p.m., MST, November 13, 2026**.

This year's ASR process will be conducted in two stages as was done for the previous years except for 2025 where the ASR process was modified to align it with the Renewal Application. The first stage of the process requires stakeholders and/or interested parties to provide feedback on the following question:

> *Is the existing total reclamation security amount as set by the Board in accordance with the 2026 Work Plan adequate to reflect the scope of activities and undertakings proposed by Baffinland in the proposed 2027 Work Plan*?

In addressing the above question, it is expected that stakeholders/interested parties will provide the Board with sufficient information regarding their key assumptions and inputs including any models used to generate and review the relevant reclamation estimate(s) pertaining to the Project. The Board requests that where parties differ in their estimates on the amount of financial security necessary to ensure appropriate closure, reclamation, restoration, and post-closure measures for the Undertaking, the parties provide clear directions and basis for the specific points of divergence.

The second stage of the process involves confirmation from the Licensee, the Qikiqtani Inuit Association (QIA), and Crown-Indigenous Relations and Northern Affairs (CIRNA) regarding the amount of financial security posted by the Licensee for reclamation of the Undertaking under the Licence and the commercial lease with the QIA, and whether updates to these amounts are currently being considered or required. This information should be provided to the Board on or before December 17, 2026 so that consideration can be given to all relevant submissions in determining the total amount of financial security to be held under the Licence prior to Baffinland commencing activities under the 2027 Work Plan.

Should you have any questions regarding the above, please direct them to the NWB Licensing Department by email to licensing@nwb-oen.ca or by phone at (867) 360-6338, or to Abid Jan, Technical Advisor, by email at abid.jan@nwb-oen.ca.

Sincerely,

**NUNAVUT WATER BOARD**



Stephanie Autut
Executive Director

Attachment: Table 1

**Table 1: Licence No: 2AM-MRY2540; Projected Timeline for the Annual Security Review Associated with the 2027 Work Plan**

| Event | Date |
|---|---|
| The Licensee filed a copy of its 2027 Work Plan as required under Schedule J of the Licence. | October 30, 2026 |
| The Licensee, CIRNAC, and QIA provide comments with respect to the ASR process and timelines proposed in this Table. | November 13, 2026 |
| CIRNAC, QIA and any other interested parties file written submissions regarding the Licensee's 2027 Work Plan and any updates to the reclamation security estimates for the Project. | December 17, 2026 |
| The Licensee files any updated information regarding additional security amounts posted with the QIA and territorial or federal authorities that have issued authorizations to the Project, including CIRNAC. | January 14, 2027 |
| Licensee files its response(s) to interveners' submissions regarding reclamation security associated with the 2027 Work Plan. | |
| Parties file any presentation materials on which the parties intend to rely during the NWB's teleconference regarding the ASR associated with the 2027 Work Plan. | January 28, 2027 |
| The NWB holds a teleconference regarding the ASR associated with the 2027 Work Plan. | February 8, 2027 |
| Parties file updates and/or addenda to the intervenor submissions (filed by December 17, 2026) and Licensee submissions (filed by January 14, 2027) based on the discussion and commitments at the teleconference. | February 18, 2027 |
| NWB to issue an ASR decision that advises the Licensee and interested parties of the total financial security required to be posted prior to commencement of the 2027 Work Plan under Part C, Item 1 of the Licence. | March 2, 2027 |
| Licensee to file any additional reclamation security amount required as determined by the NWB and set out in the ASR decision in accordance with Part C, Item 1 of Licence No: 2AM-MRY2540. | March 31, 2027 |